

WILMER CUTLER PICKERING HALE AND
DORR LLP
SONAL N. MEHTA (SBN 222086)
sonal.mehta@wilmerhale.com
THOMAS G. SPRANKLING (SBN 294831)
thomas.sprankling@wilmerhale.com
JOSEPH M. LEVY (SBN 329318)
joseph.levy@wilmerhale.com
2600 El Camino Real, Suite 400
Palo Alto, CA 94306
Telephone: (650) 858-6000

HUNTON ANDREWS KURTH LLP
Ann Marie Mortimer (State Bar No. 169077)
amortimer@HuntonAK.com
Jason J. Kim (State Bar No. 221476)
kimj@HuntonAK.com
Jeff R. R. Nelson (State Bar No. 301546)
jnelson@HuntonAK.com
550 South Hope Street, Suite 2000
Los Angeles, California 90071-2627
Telephone: (213) 532-200
Facsimile: (213) 532-2020

ARI HOLTZBLATT (*pro hac vice* pending)
Ari.Holtzblatt@wilmerhale.com
ALLISON SCHULTZ (*pro hac vice* pending)
Allison.Schultz@wilmerhale.com
ROBIN C. BURRELL (*pro hac vice* pending)
robin.burrell@wilmerhale.com
1875 Pennsylvania Ave, NW
Washington, DC 20006
Telephone: (202) 663-6000
Facsimile: (202) 663-6363

Attorneys for Plaintiff
Facebook, Inc.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

FACEBOOK, INC.

Plaintiff,

v.

BRANDTOTAL LTD., et al.,

Defendants.

Case No. 3:20-CV-07182-JCS

**DECLARATION OF SONAL MEHTA
IN SUPPORT OF PLAINTIFF'S
OPPOSITION TO DEFENDANTS' *EX*
PARTE APPLICATION FOR
TEMPORARY RESTRAINING ORDER**

1 I, Sonal Mehta, declare:

2 1. I am an attorney at the law firm Wilmer Cutler Pickering Hale and Dorr LLP, counsel
3 for Facebook in the above-captioned action. I am a member in good standing of the Bar of the State
4 of California, and I am admitted to appear before this Court. I respectfully submit this declaration in
5 support of Plaintiff's Opposition to Defendants' *Ex Parte* Application for Temporary Restraining
6 Order.

7 2. Attached hereto as **Exhibit 1** is a true and correct copy of the Google Chrome Web
8 Store Developer Agreement, available at <https://developer.chrome.com/webstore/terms>.

9 3. Attached hereto as **Exhibit 2** is a true and correct copy of the Complaint filed in
10 *Facebook, Inc. v. BrandTotal LTD.*, No. 20-CIV-04256 (Cal. Super. Ct.).

11 4. Attached hereto as **Exhibit 3** is a true and correct copy of the cease and desist letter
12 sent by Facebook to Defendants on February 14, 2020.

13
14 I declare under penalty of perjury that the foregoing is true and correct.

15 Executed on this 21st day of October 2020 in Redwood City, California.

16
17 WILMER CUTLER PICKERING HALE AND
18 DORR LLP

19 By: Sonal N. Mehta
20 Sonal N. Mehta
21
22
23
24
25
26
27
28